

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

INDICTMENT

RICHARD ANTHONY REYNA DENSMORE
(a/k/a “Rabid”),

Defendant.

The Grand Jury charges:

COUNT 1
(Sexual Exploitation of a Child)

Between in or around September 2022 and December 2022, in Manistee County, in the Southern Division of the Western District of Michigan, and elsewhere,

RICHARD ANTHONY REYNA DENSMORE

aided, abetted, counseled, commanded, induced, and procured another person to knowingly employ, use, persuade, induce, entice, and coerce an individual who had not attained the age of 18 years (“Jane Doe,” an individual known to the Grand Jury) to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate or foreign commerce.

Specifically, RICHARD ANTHONY REYNA DENSMORE directed another user on Discord, an internet application, to have Jane Doe take a picture or video exposing her genitals or pubic area. Jane Doe did so and the video, 1_495420920501685_5528.mov, was sent to RICHARD ANTHONY REYNA DENSMORE via the internet.

18 U.S.C. § 2251(a)

18 U.S.C. § 2

COUNT 2

(Conspiracy to Sexually Exploit a Child)

Between in or around September 2022 and December 2022, in Manistee County, in the Southern Division of the Western District of Michigan, and elsewhere,

RICHARD ANTHONY REYNA DENSMORE,

and another person unknown to the Grand Jury, conspired to employ, use, persuade, induce, entice, and coerce an individual who had not attained the age of 18 years (Jane Doe, the individual identified in Count 1 and known to the Grand Jury), to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, namely, conduct that resulted in the visual depiction with file name 1_495420920501685_5528.mov, knowing and having reason to know that such visual depiction would be transported using any means and facility of interstate or foreign commerce.

18 U.S.C. § 2251(a) and (e)

18 U.S.C. § 2256(2)(A) and (5)

COUNT 3
(Coercion and Enticement)

Between in or around September 2022 and December 2022, in Manistee County, in the Southern Division of the Western District of Michigan, and elsewhere,

RICHARD ANTHONY REYNA DENSMORE

used a facility and means of interstate and foreign commerce to knowingly persuade, induce, entice, and coerce, and aided, abetted, counseled, commanded, induced, and procured another person to persuade, induce, entice, and coerce, an individual who had not attained the age of 18 years (Jane Doe, the individual identified in Count 1 and known to the Grand Jury), to engage in sexual activity for which a person can be charged with a criminal offense, namely, the sexual exploitation of a child, which was a criminal offense under 18 U.S.C. § 2251(a).

18 U.S.C. § 2422(b)

18 U.S.C. § 2427

18 U.S.C. § 2256(8)

18 U.S.C. § 2251(a)

18 U.S.C. § 2

COUNT 4

(Possession of Child Pornography)

On or about February 2, 2023, in Manistee County, in the Southern Division of the Western District of Michigan,

RICHARD ANTHONY REYNA DENSMORE

knowingly possessed images and videos of child pornography, including images and videos of child pornography that involved prepubescent minors and including, but not limited to, the following visual depictions, listed by file names:

-5778366842065238993_120.jpg;

1_4974653189216273054.mp4;

1_495420920501685_5528.mov;

-4954209205473094769_109.jpg; and

1_4954209205016855506.mp4.

Such depictions were produced using materials that had been shipped and transported in and affecting interstate and foreign commerce, including, but not limited to, a Motorola cellular phone that was manufactured in China.

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

18 U.S.C. § 2256(8)(A)

COUNT 5

(Possession of Child Pornography)

On or about February 2, 2023, in Manistee County, in the Southern Division of the Western District of Michigan,

RICHARD ANTHONY REYNA DENSMORE

knowingly possessed images and videos of child pornography that involved prepubescent minors, including, but not limited to, the following visual depiction, identified by file name: IMG_0911.mp4.

Such depiction was produced using materials that had been shipped and transported in and affecting interstate and foreign commerce, including, but not limited to, an iPhone 6 cellular phone that was manufactured in China.

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

18 U.S.C. § 2256(8)(A)

FORFEITURE ALLEGATION

(Sexual Exploitation of a Child; Conspiracy to Sexually Exploit a Child; Coercion and Enticement; Possession of Child Pornography)

The allegations contained in this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 2253.

Pursuant to 18 U.S.C. § 2253, upon conviction of offenses in violation of 18 U.S.C. §§ 2251(a), 2251(e), 2422(b), and 2252A(a)(5)(B),

RICHARD ANTHONY REYNA DENSMORE

shall forfeit to the United States of America any visual depiction described in 18 U.S.C. §§ 2251 and 2252A; any matter which contains any such visual depiction that was produced, transported, mailed, shipped, and received in violation of Title 18, United States Code, Chapter 110; any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offenses; and any property, real or personal, used or intended to be used to commit or to promote the commission of the offenses or any property traceable to such property. The property to be forfeited, as to all counts, includes, but is not limited to the following:

- a. a Motorola Moto G Pure cellular phone with Android identification number b0bb3ed3ad87fc87; and
- b. an iPhone 6 with International Mobile Equipment Identity Number 359280062701847.

If the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b) and by 28 U.S.C. § 2461(c).

18 U.S.C. § 2253
21 U.S.C. § 853(p)
28 U.S.C. § 2461(c)
18 U.S.C. § 2251
18 U.S.C. § 2252A
18 U.S.C. § 2256(8)(A)

A TRUE BILL



GRAND JURY FOREPERSON

MARK A. TOTTEN
United States Attorney



ADAM B. TOWNSHEND
Assistant United States Attorney